

ANHEUSER-BUSCH DISTRIBUTOR SINCE 1930



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April 7, 2008

Federal Communications Commission
Wireline Competition Bureau
Competition Policy Division
445 12th Street SW
Washington, DC 20554

Received & Inspected

APR 10 2008

FCC Mail Room

Re: Section 63.71 – Application of CTI/Starvox Communications, Inc
Docket # 08-48

Dear Sir or Madam:

On March 24th, 2008, Del Papa Distributing Company received a notice of discontinuance of service letter from Capital Telecommunications, Inc. Although we did not receive the letter until March 24th the CapTel letter was dated March 17, 2008. The letter states that CTI and Starvox Communications intends to discontinue telecommunications services to Del Papa "effective thirty (30) days after the date of this letter, or as soon thereafter as the necessary regulatory approvals are obtained." A copy of the CTI letter is attached.

By this letter, Del Papa Distributing is writing to object to the request of CTI/Starvox to discontinue telecommunication services to Del Papa within the stated time frame. As way of background, Del Papa Distributing is an Anheuser Busch distributor with its home office in Galveston, Texas and satellite distribution centers in Beaumont and Victoria, Texas. Our distribution area covers 17 counties in Southeast Texas from the Texas/Louisiana border down to the coastal bend along the Texas Gulf Coast. Del Papa Distributing has over 350 employees and serves nearly 3,000 retail customers.

Del Papa Distributing Company has begun the process of locating a service provider to replace CTI/Starvox for its local and long distance voice and data requirements for all of its offices. Although Del Papa has made significant progress in this exercise, it will not be possible for Del Papa to have any or all of it services switched over to a new provider by the threatened cut off date of April 16, 2008. If CTI/Starvox terminates its services to Del Papa prior to our ability to transfer service to a new provider Del Papa and its customers will be adversely impacted.

Accordingly, Del Papa Distributing objects to the Section 63.71 application of CTI/Starvox and requests that the Commission deny the application for the reason the replacement service cannot be obtained within the unreasonably short notice period given by CTI / Starvox.

Thank you for your attention to this matter.

Sincerely,

Peter Williamson
Vice President & Chief Administrative Officer





Capital Telecommunications, Inc.

Voice, Data, Internet, Wireless

March 17, 2008

DEL PAPA DISTRIBUTING CO. L.P.
ATTN : ACCOUNTS PAYABLE 6702 BROADWAY
GALVESTON, TX 77554

MAR 24 2008

IMPORTANT NOTIFICATION – UPDATE - *Your action is required! You must subscribe to a telephone service provider other than CTI/Starvox prior to the end of the thirty (30) day period from the date above or you will not have access to the services currently available to you through CTI/Starvox.*

Dear Valued Customer:

Last month, we notified you that CTI and Starvox Communications ("CTI/Starvox") had entered into an agreement to transfer CTI/Starvox customers to bComm, Inc. ("bComm"). We also noted that we would update you with any development or details regarding the discontinuance of your service by CTI/Starvox. The purpose of this letter is to inform you that the agreement with bComm will not be consummated. Instead, if you haven't already, you will need to find a new service provider for your local or long distance, internet or data communications needs.

Effective thirty (30) days after the date of this letter, or as soon thereafter as the necessary regulatory approvals are obtained, CTI/Starvox will be discontinuing your telecommunications services. This discontinuance affects service in all states in which CTI/Starvox provides telecommunications service. This notice clarifies and supersedes any previous communications on this issue.

CTI/Starvox will cooperate with you through the date of discontinuance concerning the transition of your telephone service to an alternative carrier of your choice and will assist you in transitioning your existing local telephone number(s) where permitted. Please consult your local telephone directory or the incumbent local exchange carrier(s) in your area for a list of other possible providers. Should you need our assistance, please contact us at 800-673-2400. We regret to inform you that certain underlying vendors of critical services have threatened to cease providing service to CTI/Starvox. If any such vendor stops providing service, the effect could be to render us unable to provide service to you for reasons beyond our control even before the thirty (30) day period has expired. Thus, it is vital that you obtain service from a substitute provider immediately.

The FCC will normally authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments within fifteen (15) days after receipt of this notification. Address them to the Federal Communications Commission, Washington, DC 20554, referencing the §63.71 Application of CTI/StarVox Communications Inc. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

CTI/Starvox appreciates your business, and we regret that we will no longer be providing your telephone services. It has been our pleasure serving you.

CTI/Starvox Communications, Inc.

200 West Market Street • York, PA 17401 • www.captel.com
phone: 717-848-8800 • toll-free: 800-673-2400 • fax: 717-848-8806

CTI is a wholly owned subsidiary of StarVox Communications, Inc.



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